June 8, 2006



Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W) RE: Business Opportunity Rule, R511993 600 Pennsylvania Avenue, NW Washington, DC 20580

522418-70509

Dear Sir or Madam:

As an Independent Mannatech Associate the proposed Business Opportunity Rule R511993 concerns me for a number of reasons:

First of all, requiring seven days before any prospective purchaser signs a contract or makes a payment to the seller implies a message of alarm... "Do I need my lawyer to review this?", "There must be something wrong with this information/product or the government wouldn't require a waiting period", etc. Why are direct marketing companies being targeted? Will there be laws for retail stores stating upon entering the store the potential purchaser must have planned one week prior and purchase only what had been planned ahead of time? Does the government plan to prevent retail stores from playing music, having specific aromas, or specially designed displays that are utilized to promote impulse buying? This idea is outrageous. Are you also suggesting that representatives need to do a background and credit check on all potential customers while they walk away with the valuable product for seven days without paying? This is also an unrealistic option.

Next is the disclosure statement. 1) Lawsuits are being initiated at an increasingly alarming rate in this country. The only ones that matter are those where a party is found guilty of a charge. At that point I wholeheartedly agree that disclosure is necessary. In addition to being an Independent Mannatech Associate, I am a RN. If physicians disclosed to their potential patients all the lawsuits that they have been a part of, I wonder how many physicians would still be able to make a living due to the damage (both justly and unjustly) this would cause their practices? Prior to dispensing a medication do physicians disclose that tens, if not hundreds, of thousands people died last year from taking the prescribed dose of this specific medication and this many people died from overdose? In my more than 10 years in a hospital setting I have never heard anything close to that information being shared with a "potential purchaser". 2) Providing a list of direct sellers who have cancelled with two years. That list would provide no useful information to a potential purchaser. People die, have economical setbacks, change vocations, and relocate all the time. Asking this type of information is a severe invasion of privacy as is the requirement of providing references. 3) Identity theft and invasion of privacy are rampant with the "advancement" of computer technology. Forcing people to provide references is an undue burden. Mannatech has provided verifiable and well documented testimonials from product users in an easy to access format. All of my siblings and their families are on the product and are happy to share references with whom we chose to share information about our company. A personal reference means more than a list of strangers.

An earnings claim statement is yet another form of invasion of privacy. I know a number of people in retail. Their employer doesn't have to disclose their salary to them while they work on commission. Why should direct marketing? Mannatech clearly states their compensation plan. With any business the rewards are a direct result of the effort you put into the business. This proposed ruling is proposing a lot of paperwork, time delay, and pointless busywork.

I have chosen to associate with Mannatech for over a year now I am not a salesperson and never will be, however I cannot help but share and educate people about the technology that this company has developed. It is an added bonus to be able to make some money while being able to easily share this information. Numerous

other direct marketing companies have approached me about their products and "business opportunity" but I have declined. I can understand and appreciate why the FTC is working to protect consumers from those types of companies. However, Mannatech is a company with integrity and its products have proven to be essential to me, my family, and friends. Your proposal would punish the legitimate companies along with those who should not be in business.

While I have developed a business in my spare time with Mannatech, with your proposal I wouldn't have the time to spend doing all the paperwork and recordkeeping that it would entail. As a 38 year-old I cannot rely on social security, so I must chose wisely how to manage my time and money in order to prepare for my future retirement. I hope you will reconsider the proposal as the consequences will be quite damaging to people like me who want to live financially independent of government assistance.

Tamara J Snell
RN, MT